# Oklahoma
# BEAD Grant Program

## Final Proposal



OKLAHOMA
Broadband Office

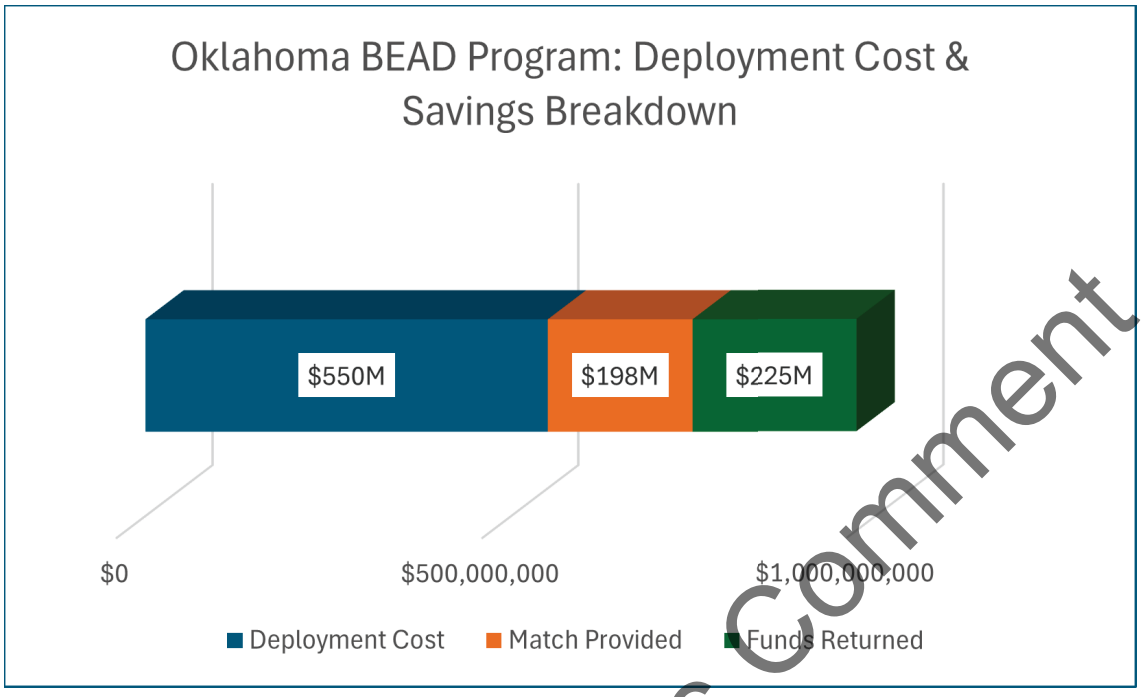
# Introduction

The Oklahoma Broadband Office is honored to present this Final Proposal for the Broadband Equity, Access, and Deployment (BEAD) Program. This milestone represents not only the dedication of our team but also the collective efforts of leaders, partners, and communities across our state who share a vision of ensuring every Oklahoman has access to affordable, reliable, high-speed internet.

We extend our deepest gratitude to Governor J. Kevin Stitt, Speaker of the House Kyle Hilbert, and Senate Pro Tempore Lonnie Paxton for their steadfast leadership and continued support of broadband expansion as a cornerstone of Oklahoma's growth and competitiveness.

We also thank the National Telecommunications and Information Administration (NTIA) and Oklahoma's Federal Program Officer for their guidance, partnership, and commitment to ensuring a fair and effective process that empowers states to bridge the digital divide.

This proposal would not have been possible without the active engagement of our Broadband Governing Board, Internet Service Providers, vendors, and countless community members who contributed valuable insights, participated in outreach efforts, and shared their experiences. Their voices and perspectives have shaped a proposal that reflects both the challenges and opportunities present in communities across Oklahoma.




The chart above reflects the total funding allocations resulting from the Oklahoma Broadband Office's competitive Benefit of the Bargain subgrantee selection process. In total, $550 million in deployment funds and nearly $198 million in matching contributions will be awarded to 20 Internet Service Providers (ISPs) for 70 deployment projects to expand high-speed broadband access across the state.

Through careful review and negotiation, the process also generated significant cost savings, allowing $225 million to be returned to NTIA, ensuring responsible stewardship of federal resources while maximizing broadband impact for Oklahoma communities.

Together, we are building more than infrastructure—we are building pathways to education, healthcare, jobs, and opportunity. This proposal stands as a testament to the collaboration, transparency, and shared determination that will allow Oklahoma to close the digital divide and unlock the full potential of our people and economy.

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# FINAL PROPOSAL DATA SUBMISSION

**0.1 Attachment (Required):** Complete and submit the Subgrantees CSV file (named *"fp_subgrantees.csv")* using the NTIA template provided.

See attachment here: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

**0.2 Attachment (Required):** Complete and submit the Deployment Projects CSV file (named *"fp_deployment_projects.csv")* using the NTIA template provided.

See attachment here: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

**0.3 Attachment (Required):** Complete and submit the Locations CSV file (named *"fp_locations.csv")* using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See attachment here: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

**0.4 Attachment (Required):** Complete and submit the No BEAD Locations CSV file (named *"fp_no_BEAO_locations.csv")* using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See attachment here: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

**0.5 Question (YIN):** If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)?



NTIA

Yes.

**0.6 Attachment (Required - Conditional on a 'Yes' Response to Intake Question 0.5):** Complete and submit the CAIs CSV file (named *"fp_cai.csv"*) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity's compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results.

See attachment here: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

# SUBGRANTEE SELECTION PROCESS OUTCOMES (REQUIREMENT 1)

**1.1: Text Box:** Describe how the Eligible Entity's deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice.

**Timelines**

Prior to opening the first Subgrantee Selection Process, the Oklahoma Broadband Office opened Pre-registration which launched January 21, 2025. During that time, the office received 43 different preregistration applications. Of the initial 43 applications, 42 were approved as one applicant withdrew.

**Phases**

Oklahoma's initial subgrantee selection is organized into multiple candidate pool rounds. Rounds I through IV are structured around key programmatic priorities, including a strong preference for end-to-end fiber-optic builds and the targeting of high-

density unserved areas. A final round was reserved for closing remaining coverage gaps, with flexible criteria to ensure no location is left behind however, this round was not executed.

The Oklahoma Broadband Office (OBO) conducted its initial Subgrantee Selection Process on April 17, 2025, and closed May 22, 2025. During this subgrantee process, the OBO followed it's approved Initial Proposal Volume II, as allowed by NTIA. The OBO utilized its 4 candidate pools in order to prioritize the preferences of NTIA at the time. During the initial Subgrantee Selection Process, the OBO received 583 applications from 36 Internet Service Providers.

Upon the release of the June 6, 2025 NTIA Policy Notice, the OBO determined that it was best to reopen the application process, allowing past applicants to "opt out" if they do not wish to have their original application(s) moved forward to the updated process. On July 14, 2025, the OBO reopened both it's Subgrantee Selection Process ("Benefit of the Bargen") as well as the preregistration allowing additional applicants and applications to be considered for the BEAD program in Oklahoma.

The Benefit of the Bargen closed on July 23, 2025 at 11:59pm with 398 applications submitted. The OBO begun its review on July 28, 2025 and discovered that several applications had not uploaded the required documentation such as the budget schedule, project timeline, tribal resolution of consent if applicable, and other required documentation. The OBO then reopened all applications for all applicants so that additional documentation could be uploaded. This window was open for 24 hours closed at 11:59pm on July 29, 2025.



**Project Area Definitions**

The OBO deployed the use of Network Expansion Territories (NETs) which are carefully defined geographic zones created through geospatial clustering of unserved and underserved Broadband Serviceable Locations (BSLs). This structure allows for efficient infrastructure design, minimizes service overlap, and supports competitive bidding by segmenting the state into manageable, contiguous service areas. Additionally, it also allows for better tracking and negotiation to be conducted by the

OBO should such negotiation be required.

The process of developing the NETS began with a comprehensive geospatial planning phase that integrated NTIA's BSL Fabric, state broadband availability data, and localized input to identify target areas most in need of service. This was followed by a formal Request for Information (RFI) period, during which the OBO solicited feedback from internet service providers, local and tribal governments, and community organizations to validate NET financial viability, technical viability, and surface additional needs. Upon conclusion of the feedback phase, NETs were finalized and published alongside maps and initial service eligibility data prior to the release of the Version 6 fabric data.

**Evaluation Procedures and Strategies**

**Scoring Methodology**

The OBO utilized the updated scoring criteria as described in the June 6th Policy Notice. The scoring criteria was used as follows:

**Primary Scoring Criteria**

- Minimal BEAD Outlay- the total cost to the BEAD program on a per broadband serviceable location cost. Applicants could receive a score of up 65 points.

**Secondary Scoring Criteria**

- Speed to Deployment- the amount of time it would take the internet service provider to have service to end customers. Applicants could receive a score of up to 8 points.
- Speed of Network- the speeds expected by the end of deployment. Applicants could receive a score of up to 100 points.

The OBO reviewed applications scoring them utilizing only primary scoring criterion unless multiple applications were within 15% of cost to each other. If the applications were determined to be within the 15% threshold, the OBO then scored the application utilizing the secondary criterion.

**Tribal Consent Review**

The OBO also reviewed tribal consent documentation at this time. Tribal consent documentation was reviewed and prioritized on a good, better, best scale.

- Good: The applicant reached out to the tribal entity, but no response was received.
- Better: The applicant received written confirmation of consent, but official documentation had not been obtained at the time of application.
- Best: The applicant received official documentation on tribal letterhead, signed by the appropriate tribal leader, providing consent to the internet service provider.

**Technical Review**

The OBO partnered with the Oklahoma Department of Transportation to review the technical viability of the applications. ODOT has a broadband department with several certified professional engineers, which reviewed each BEAD application. The following questions were utilized in order to determine technical viability:

- Does the application describe the selection of technology and particular hardware configurations in both backbone and last-mile segments that supports subgrantee applicant's speed claim.
- Does the application describe the assumptions and/or calculations around capacity oversubscription limitations imposed by terrain and geographic constraints to definitively demonstrate the connection speed and network capacity requirements can be met.
- Does the application describe how the proposed infrastructure will be scalable in terms of incremental capacity meaning the proposed network can scale by adding such capacity in a cost effective manner as new customers are added.
- Does the application describe how incremental capacity will be added in a cost-effective manner during the useful life of the network.
- Does the application describe how the proposed infrastructure will be scalable in terms of future capacity, meaning the proposed network can meet future speed and performance needs?
- Does the application describe the targeted performance levels and technical

approach to network for upgrades and replacements as well as projected capital costs for such upgrades in the backbone and last-mile segments.

- Upload a technical narrative as a PDF detailing: Does the applicant show how the proposed infrastructure will deliver service that reliably meets or exceeds the program required speeds and latency for all proposed BSLs and CAIs in the project area as outlined in the BEAD NOFO pp. 64-65.

**1.2 Text Box:** Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.



**Fair, Open, and Competitive Process**

The Oklahoma Broadband Office (OBO) implemented a comprehensive set of safeguards and internal controls to ensure that the Subgrantee Selection Process for the BEAD program was conducted in a manner that was fair, open, and competitive. These safeguards were designed not only to comply with state procurement policies and the requirements outlined in the BEAD Initial Proposal, as modified by the BEAD Restructuring Policy Notice, but also to foster public confidence in the integrity and transparency of the selection process.

**Safeguards Against Collusion, Bias, and Conflicts of Interest**

To prevent collusion and undue influence, the OBO enforced a strict communications "blackout" period during all active competitive processes. During this time, OBO staff did not accept calls, emails, or direct outreach from Internet Service Providers (ISPs) or the public. Instead, all inquiries were centralized through a designated public email address (BEAD@broadband.ok.gov). Responses were provided exclusively through a Frequently Asked Questions (FAQ) document posted and regularly updated on the OBO's website. This ensured that all potential applicants received the same information simultaneously, preventing favoritism or unequal access to information.

All reviewers, staff, and Governing Board members involved in the process were required to submit written conflict-of-interest disclosures prior to participating in any

reviews or discussion of application materials. Any individual with an identified conflict recused from the BEAD process. This process extended not only to OBO staff but also to the Oklahoma Broadband Governing Board and external reviewers. By requiring multiple layers of conflict disclosures, OBO safeguarded against both actual and perceived conflicts of interest.

**Transparency and Public Notice**

To maintain openness, OBO provided broad public notice of funding opportunities through its official website and other public communication channels. All eligible applicants defined in the Initial Proposal and NTIA's June 6th Policy Notice were permitted to participate, and application windows were designed to provide a reasonable timeframe to submit materials without imposing undue burdens. Extensions were not granted, ensuring fairness while preserving the integrity of deadlines.

OBO also published a "Benefit of the Bargain Round Primer" that outlined changes to scoring criteria, clarified programmatic requirements following the June 6th Policy Notice, and provided updated lists of Broadband Serviceable Locations and Community Anchor Institutions. By issuing this primer in advance, OBO ensured that all applicants had equal access to updated rules, expectations, and evaluation metrics prior to application submission.

**Competitive Neutrality and Evaluation**

To preserve competitiveness, OBO utilized a scoring methodology that was neutral with respect to provider type and scale, ensuring that all eligible entities, whether large or small, wireline or wireless, could submit competitive applications. The scoring criteria was published in advance, applied consistently across applicants, and implemented through a multi-layered review process that combined automation and human oversight.

Applications were processed through an automated scoring tool developed by Ready.net. The automated scoring system applied evaluation criteria uniformly across all applicants, eliminating the potential for arbitrary scoring decisions. Following this step, two independent scoring teams within OBO validated and confirmed the results. Only designated scorers, all of whom had completed conflict-of-interest forms, had

access to applications during this stage.

Applications also underwent a technical review conducted by the Engineering Division of the Oklahoma Department of Transportation (ODOT). These engineers, who were not affiliated with OBO or any potential applicant, provided independent evaluations of proposed network designs and technical feasibility. This separation further reduced risk of bias and improved objectivity.

**Reviewer Training and Oversight**

OBO placed significant emphasis on ensuring that all reviewers were properly trained, qualified, and objective. Training materials included instructions on consistent application of scoring rubrics, proper documentation of review findings, and mandatory reporting of conflicts of interest. Reviewers were instructed to provide check and double-check scoring decisions, creating an auditable record that facilitated both transparency and accountability.

To ensure quality and oversight, OBO employed a layered review process. Applications were reviewed by both technical experts (for engineering feasibility) and programmatic scorers (for policy and compliance criteria). Where necessary, reviewers with specialized expertise (such as professional engineers) evaluated components requiring technical judgment. Review oversight mechanisms included internal cross-checks, supervisory reviews, and final approval by the Oklahoma Broadband Governing Board.

**Conclusion**

Through these measures, strict conflict safeguards, centralized public communications, pre-publication of evaluation criteria, reliance on independent technical experts, automated scoring confirmation, reviewer training, and multi-layered oversight, the OBO ensured that the BEAD Subgrantee Selection Process was fair, open, and competitive. These steps collectively mitigate the possible risks of collusion, bias, conflicts of interest, arbitrary decision-making, and any action that could undermine confidence in the process.

1.3 **Text Box:** Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.

Yes.

**1.4 Text Box:** If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

The Oklahoma Broadband Office (OBO) posted an originally approved list of Community Anchor Institutions (CAIs) that included schools, libraries, local, state, federal or Tribal government buildings, health care centers, public safety buildings, public housing organizations, community support organizations, and prisons or correctional facilities. These eligible Community Anchor Institutions were included in the OBO's approved list of post challenge locations. The total approved CAIs amounted to 9,139 locations. After the June 6th, 2025 Policy Notice was published, the OBO revised its list of CAIs to align with the definition used in IIJA. As instructed in the Policy Notice, childcare centers, prisons and correctional facilities were removed from eligibility. The OBO worked to ensure that locations that benefit communities most had potential improved service available while still strongly and unwaveringly adhering to the IIJA and NTIA definitions of a Community Anchor Institution. Once the updated list was identified, Oklahoma has 7,940 locations that it will consider as a CAI for potential funding opportunities.

**1.5 Question (Y/N):** Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

Yes.

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# TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3)

**3.1Text Box:** Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.



The OBO affirms that it will ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. This requirement is not only in the application process, but also in the grant agreement for awarded projects and the OBO shall monitor this requirement based on the compliance and reporting obligations outlined in the OBO Monitoring Plan (hereafter, “the monitoring plan”).

The OBO affirms that it will ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of the OBO’s period of performance. The OBO will enforce this requirement with provisions of the grant agreement that require all subawards be completed no later than 120 days prior to the end of the OBO’s BEAD period of performance. In addition, each subaward grant agreement shall have attached the project timeline with PE certification from the application to ensure each subaward is satisfying their period of performance they outlined in their application and were awarded/scored on. The monitoring plan will establish either quarterly or monthly reporting (in addition to semi-annual reporting) that are required for each project so the OBO can properly monitor each projects grant activities to ensure the subrecipient is following their project timeline and will reach substantial completion within four years of being awarded. The OBO shall establish in the monitoring plan a close out process for both subrecipients and the OBO once all subawards have reached substantial completion and

properly closed out.

The OBO affirms it will ensure each subgrantee reaches key milestones in their submitted application, as outlined in their project timeline that will be used in their monitoring plan. In addition to the project timeline, the OBO will also attach to each grant agreement the project "budget template" that each applicant completed to demonstrate their planned grant expenditures, including milestones, to ensure the project will be completed on time. The OBO also affirms each subrecipient will be held to their "speed to deployment" response that was scored in their application. The OBO will enforce each subrecipient's "speed to deployment" based on the ongoing post award reporting and project tracking that is outlined in the monitoring plan. The OBO affirms it will ensure the completion of all BEAD activities within the mandated timeframes by enforcing each subrecipient's project timeline and "speed to deployment" from their application under the terms of the grant agreement and monitoring plan.

# OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

**4.1 Question (YIN):** Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

Yes.

**4.2 Attachments:** Upload the following two required documents:

(1) BEAD program monitoring plan;

(2) Agency policy documentation which includes the following practices:

a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and

b. Timely subgrantee (to Eligible Entity) reporting mandates.

See attachments here: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

**4.3 Question (YIN):** Certify that the subgrant agreements will include, at a minimum, the following conditions:

a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;
d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance

is consistently assessed and tracked over time.

Yes.

# LOCAL COORDINATION (REQUIREMENT 5)

**5.1 Text Box:** Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments.

The Oklahoma Broadband Office (OBO) will conduct a 7-day public comment period, from August 25th to September 1st, to allow the general public and political subdivisions the opportunity to provide feedback. The Office made the Final Proposal available for public comment through a public posting on their website and announcing the public comment period through various public channels. Comments can be provided via email to BEAD@broadband.ok.gov until the publicized close date. The OBO will review all public comments submitted and incorporate feedback as applicable.

# CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

**6.1 Question (YIN):** Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

Yes.

**6.2 Text Box:** Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.

The Oklahoma Broadband Office published the final list of Broadband Serviceable Locations (BSLs) and Community Anchor Institutions (CAIs) on July 11, 2025 to its website here: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.htm. There was one update made to the locations prior to the BEAD Benefit of the Bargain Round opening on July 14, 2025. The update was noted on the OBO's website specifying the time that the update was made.

# UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

7.1 **Question (YIN):** Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

Yes.

7.2 **Text Box:** If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

N/A.

7.3 **Attachment (Optional):** If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

N/A.

7.4 **Question (YIN):** Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

Yes.

7.5 **Text Box():** If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonable excessive,, explain and include a strong showing of how the Eligible Entity made that determination.

N/A.

7.6 **Attachment (Optional** ): If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

N/A.

7.7 **Question (YIN):** Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the *fp_no_BEAD_locations.csv* file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

Yes.

7.8 **Question (YIN):** Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to,

and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

Yes.

# IMPLEMENTATION STATUS OF PLANS FOR COST AND BARRIER REDUCTION, COMPLIANCE WITH LABOR LAWS, LOW-COST PLANS, AND NETWORK RELIABILITY AND RESILIENCE (REQUIREMENT 11)

**11.1 Text Box:** Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.

In progress.

**11.2 Question (YIN):** Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Yes.

**11.3 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.2):** If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

N/A.

**11.4 Question (YIN):** Certify that all subgrantees selected by the Eligible

Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.[6]

Yes.

**11.5 Text Box** (Optional - Conditional on a 'No' Response to Intake Question 11.4): If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10- year Federal interest period, explain why the Eligible Entity was unable to do so.

N/A.

**11.6 Question (YIN):** Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

Yes.

**11.7 Text Box (Optional - Conditional on a 'No' Response to Intake Question 11.6):** If the Eligible Entity does not certify that subgrantees have ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

N/A.



# SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQUIREMENT 12)

**12.1 Text Box: Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.**

The OBO implemented both the IIJA and June 6, 2025 Policy Notice definition of a Priority

Broadband Project.

The term "priority broadband project" means a project designed to-

i. provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and

ii. ensure that the network built by the project can easily scale speeds over time to 1) meet the evolving connectivity needs of households and businesses; and 2) support the deployment of SG, successor wireless technologies, and other advanced services.

For the purposes of the BEAD application process, applicants were required to provide documentation outlining the following:

- Network speeds of no less than 100mbps/20mbps
- Latency less than 100
- Documentation of scalability
- Documentation of potential implementation of successor technologies, 5g, and other advanced services.

The OBO specifically asked applicants if their project should be considered a Priority Broadband Project at which time the applicant could answer yes or no. If the applicant answered yes, the application and support documentation was reviewed in order to ascertain confirmation of the above listed Priority Broadband Project requirements.

If an applicant selected that they should not be considered a Priority Broadband Project, the project was sorted away from the Priority Broadband Projects and was scored utilizing the primary and secondary criterion but would only be awarded in the case that a Priority Broadband Project was either excessive cost or could not actually meet the requirements of a Priority Broadband Project.



# SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13)

### 13.1 **Text Box:** Provide a narrative summary of how the Eligible Entity applied

the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

All applications were reviewed prioritizing Priority Broadband Projects and then Non-Priority Broadband Projects as specified in the June 6th policy notice released by NTIA. The OBO utilized the Minimal BEAD Outlay as the primary scoring criterion, using the applicants requested BEAD funding amount, exclusive of the entities match amount to determine the application score. The scores are listed below:

| **Minimal BEAD Program Outlay** | $0*-$999.99 | 65 - 58.5065 points |
|---|---|---|
| | $1,000-$1,999.99 | 58.5 - 52.000065 points |
| | $2,000-$2,999.99 | 52 - 45.500065 points |
| | $3,000-$3,999.99 | 45.5 - 39.000065 points |
| | $4,000-4,999.99 | 39 - 32.500065 points |
| | $5,000-5,999.99 | 32.5 - 26.000065 points |
| | $6,000-6,999.99 | 26 - 19.500065 points |
| | $7,000-7,999.99 | 19.5 - 13.000065 points |
| | $8,000-8,999.99 | 13 - 6.500065 points |
| | $9,000-$9,999.99 | 6.5 - 0.000065 points |
| | $10,000-$14,999.99 | 0 – (-32.499935) points |
| | $15,000 or more | -32.5 points** |

*Note: 1) Based on the formula: 65*($10,000 - BEAD Program Outlay per Passing)/$10,000. 2) The number $10,000 is an arbitrary scaling factor but ensures similar treatment across pools in the way that cost-effectiveness affects selection decisions. The "$0" value for Minimum BEAD Program Outlay is included in the table for completeness in elucidating the impact of the formula on applicant scores. The OBO does not expect to receive $0 offers of deployment, and would be hesitant to accept them if offered, since the lack of a grant would create legal challenges for the office to enforce a deployment commitment. The use of the formula can result in negative point values, implying the Minimal BEAD Program Outlay factor has greater weight than its 65 points would suggest. The range of variation is not from 0 to 65, but from 65 down to negative numbers with no floor.*

However, it should be noted that the lowest cost project, unless within 15% of cost with competing applications, will receive BEAD funding so long as the final project combinations (ie. the entire state) are the lowest cost to the BEAD program.

For each application, the OBO reviewed materials to ensure that the application was complete. In partnership with the Oklahoma Department of Transportation, the applications were reviewed for technical and logistical viability. Upon the completion of this initial review, the OBO scored all Priority Broadband Project applications utilizing the Minimal BEAD Outlay criteria. In the case where one or more projects were requesting similar project areas (90% of locations overlapping) and the projects were within 15% of cost to the BEAD program, the OBO moved those projects into the secondary scoring criteria pool.

Those applications were then scored utilizing the following point values:

| | | |
|---|---|---|
| **Speed to Deployment** | <12 Months | 8 |
| | 12.1-23 Months | 5 |
| | 23.1-36 Months | 2 |
| | 36.1-48 Months | 0 |
| | 48+ Months | DQ |
| | | |
| **Speed of Network (Max Download)** | 1 Gbps+ | 25 points |
| | 500+ Mbps | 15 points |
| | 300+ Mbps | 10 points |
| | 100+ Mbps | 5 points |
| | 100 Mbps | 0 points |
| | | |
| **Speed of Network (Max Upload)** | 1 Gbps+ | 25 points |
| | 500+ Mbps | 15 points |
| | 300+ Mbps | 10 points |
| | 100+ Mbps | 5 points |
| | 20 Mbps | 0 points |
| | | |
| **Speed of Network (Min Download)** | 1 Gbps+ | 25 points |
| | 500+ Mbps | 15 points |

| | | |
|---|---|---|
| | 300+ Mbps | 10 points |
| | 100+ Mbps | 5 points |
| | 100 Mbps | 0 points |
| | | |
| **Speed of Network (Min Upload)** | 1 Gbps+ | 25 points |
| | 500+ Mbps | 15 points |
| | 300+ Mbps | 10 points |
| | 100+ Mbps | 5 points |
| | 20 Mbps | 0 points |

If there was a tied scoring utilizing the above criteria, in the case that one of the tied applicants was a previously provisional subgrantee, that applicant would receive the project area over an applicant that had not previously participated in Oklahoma's BEAD process.

# ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) DOCUMENTATION (REQUIREMENT 14)

**14.1 Attachment (Required):** Submit a document which includes the following:

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to

prepare or to supervise the preparation of all required environmental analyses and review documents.

- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at https://www.firstnet.gov/network/environmental-compliance/projects/regional- programmatic-environmental-impact-statements.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

See EHP Documentation Attachment Requirement 14: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

# CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15)

**15.1 Attachment(s) (Required if any deployment project is on Tribal Lands):** Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

See Tribal Consent Attachments: https://oklahoma.gov/broadband/grant-programs/broadband-equity-access-and-deployment-program-.html

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# PROHIBITION ON EXCLUDING PROVIDER TYPES (REQUIREMENT 16)

**16.1 Question (YIN):** Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Yes.

# WAIVERS

**17.1 Text Box:** If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.'

N/A.

**17.2 Attachment (Optional):** If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.